



PACIFIC TELECOM SERVICES, INC.

Bringing People TogetherSM

26 February 2009

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FCC Mail Room

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554.

Dear Madame --

Enclosed is the annual CPNI Certification for EB Docket 06-36

Regards,

Michael P. Haley
President

Cc: Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers
Division, 445 12th Street, SW, Washington, DC 20554,

3231 Bear Creek Dr., Newbury Park, CA 91320-5004

Tel: 1.805.236.6322; email: m.haley2@verizon.net

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008
Date filed: 26 February 2009
Name of company covered by this certification: Pacific Telecom
Services, LLC
Form 499 Filer ID: 823794
Name of signatory: Michael P. Haley
Title of signatory: President

I, Michael P. Haley, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has not established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is not in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. If affirmative: [Provide explanation of any actions taken against data brokers]

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed


Michael P. Haley

Accompanying Statement to Annual 64.2009(e) CPNI Certification for 2008

WHEREAS, The Bureau has been investigating the adequacy of procedures implemented by telecommunications carriers to ensure confidentiality of their subscribers' CPNI, based on concerns regarding the apparent availability to third parties of sensitive, personal subscriber information.

WHEREAS, the following definitions are used by the FCC -

c. Customer (47 C.F.R. § 64.2003(c))

A customer of a telecommunications carrier is a person or entity to which the telecommunications carrier is currently providing service.

d. Customer Proprietary Network Information (47 U.S.C. § 222(h)(1))

Customer Proprietary Network Information (CPNI) is defined as:

- i. Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- ii. Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.
- iii. **Except** that such term does not include subscriber list information.

Information that Your Telephone Company Collects

Your local, long distance, and wireless telephone companies, as well as your Voice over Internet Provider (VoIP), collect information such as the numbers you call and when you call them, as well as the particular services you use, such as call forwarding or voice mail. These companies collect this customer information, also called Customer Proprietary Network Information (CPNI), so they can provide the services you have requested and send you bills for them.

THEREFORE, in response to the request by the FCC Enforcement Bureau the following process, procedures and explanation is provided as a means to explain the lack of and/or minimal procedures that are in place.

Pacific Telecom Services, LLC (PTS) does NOT have any single "person" or "entity" subscribers as would commonly be referred to as a subscriber by a wireless or local exchange telecommunications company and therefore has not developed or implemented any procedures in writing related to subscriber CPNI. Further, due to ignorance on the part of PTS at the time and now based upon the above definitions, PTS did not file a certification nor does it believe that it has any CPNI

information at all and therefore is not required to file the annual certification since we have nothing to certify.

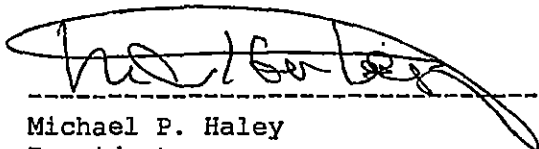
PTS is strictly a wholesale telecom service provider (tsp) and therefore provides only wholesale origination or termination services to other wholesale telecommunication service providers. Most of PTS wholesale customers are located outside the USA. As such, PTS does not obtain or maintain any calling information that is associated with an individual subscriber name or address. PTS does maintain call detail record (CDR) information on the wholesale calls that are processed for our wholesale customers which includes the called and calling numbers, but are stored by date and not by any phone number arrangement. Not all calls have calling party numbers.

Under normal circumstances, PTS does not provide any call detail (CDR) to its wholesale customers unless they specifically ask for the information to support a specific periodic bill. PTS has not had any request for CDRs from its USA based wholesale customers in the current reporting period. In the case of a request, all CDRs for a given period of time, from all calls received from or sent to a wholesale customer are provided to the wholesale customer (and only to a wholesale customer). CDRs are NEVER provided to an entity that is not the wholesale customer "owning" the CDRs, except in the case of a written federal order.

All wholesale CDRs are retained for only 6 months and the CDR system is on a private LAN and does not have a public IP address. The CDRs are not used by PTS for any purpose except to determine total minutes called by all phone numbers to a particular country so that we can bill the wholesale customer for the total minutes.

PTS does maintain a web site that can be accessed by the wholesale customer to download CDRs that are related to their wholesale telephone traffic. The website requires that the authorized person accessing the web site has the IP address of the website in their PC hosts.xxx file, has a proper username and password. All users are restricted to accounts assigned to that specific wholesale customer.

The above is a true statement related to operations and access to the wholesale telecom traffic handled by Pacific Telecom Services, LLC.



Michael P. Haley
President
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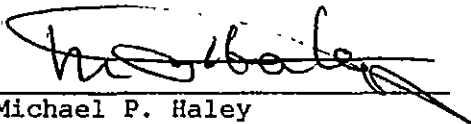
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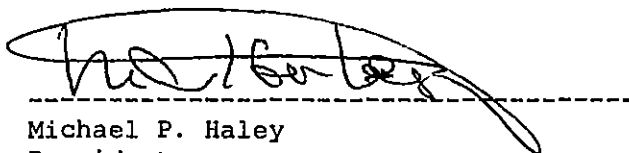
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